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JUN 8 2005

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June 8, 2005

Mr. Charles Terreni  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Petition to Establish Generic Docket to Consider Amendments to  
Interconnection Agreements Resulting From Changes of Law  
Docket No. 2004-316-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of a Joint Motion of the Competitive Carriers of the South, Inc. ("CompSouth") and BellSouth Telecommunications, Inc. ("BellSouth") to adopt a procedural schedule in the above-referenced matter.

CompSouth and BellSouth (collectively, "the Parties") respectfully request that the Commission use this docket to consider and address various issues related to BellSouth's obligations to provide unbundled network elements in South Carolina. The Parties are working on a joint issues list which, as explained in the Joint Motion, the Parties propose to file with the Commission on June 27, 2005.

The matters that will be addressed in this docket will be considered in each of the nine states in the BellSouth region. Accordingly, careful coordination between the Parties and the several state commissions involved is important. In an effort to facilitate this coordination, the Parties have worked together to negotiate a multi-jurisdictional schedule that is attached as Exhibit A to the Joint Motion.

Mr. Charles Terreni  
June 8, 2005  
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By copy of this letter, I am serving this Joint Motion on all parties of record.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive style with a large, stylized "P" and "T".

Patrick W. Turner

PWT/nml  
Enclosure  
DM5 588286

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re: )  
 ) Docket No. 2004-316-C  
Petition to Establish Generic Docket to )  
Consider Amendments to Interconnection )  
Agreements Resulting From Changes of Law )  
\_\_\_\_\_ )

**JOINT MOTION OF COMPSOUTH AND BELLSOUTH  
TO ADOPT SCHEDULE**

The Competitive Carriers of the South, Inc. ("CompSouth") and BellSouth Telecommunications, Inc. ("BellSouth") jointly and respectfully submit this Motion to Adopt Schedule in this docket.

**DISCUSSION**

The Commission has established this docket as a generic proceeding, and this docket has been used to address change-of-law issues arising from the Federal Communications Commission's Triennial Review Order, FCC 03-36, 18 FCC Rcd 16978 (Aug. 21, 2003) ("*TRO*"), *Order and Notice of Proposed Rulemaking* in WC Docket No. 04-313, CC Docket No. 01-338 (rel. Aug. 20, 2004) ("*Interim Rules Order*") ("*IRO*"), and *Triennial Review Remand Order*, FCC 04-290, WC Docket No. 04-313, CC Docket No. 01-338 (rel. Feb. 4, 2005) ("*TRRO*"). CompSouth and BellSouth (collectively, "the Parties") respectfully request that the Commission use this docket to consider and address various issues related to BellSouth's obligations to provide unbundled network elements in South Carolina. The Parties are working on a joint issues list which, as explained below, the Parties propose to file with the Commission on June 27, 2005.

The matters that will be addressed in this docket will be considered in each of the nine states in the BellSouth region. Accordingly, careful coordination between the Parties and the several state commissions involved is important. In an effort to facilitate this coordination, the Parties have worked together to negotiate a multi-jurisdictional schedule that is attached as Exhibit A. If this Joint Motion is granted, the schedule for this proceeding would be as follows:

Wednesday, June 29, 2005	Parties Submit Issues List
Tuesday, August 23, 2005	Pre-Filed Direct Testimony Due
Thursday, September 29, 2005	Pre-Filed Rebuttal Testimony Due
Monday and Tuesday, October 17-18, 2005	Hearing
Friday, November 18, 2005	Briefs Due

This schedule allows the Parties and the various state commissions an opportunity to efficiently and promptly consider the important issues to be resolved in this docket.

### **CONCLUSION**

For the reasons set forth above, the Parties respectfully request that the Commission enter an order adopting the schedule proposed above in this proceeding.

Respectfully submitted,



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Patrick W. Turner  
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BELLSOUTH TELECOMMUNICATIONS, INC.

Robert Tyson by part w/ permission

Robert E. Tyson, Jr.

Sowell Gray Stepp & Laffitte, L.L.C.

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(803) 929-1400

ATTORNEY FOR COMPSOUTH

587857

# EXHIBIT A

wk beginning	week	state 1 (GA)	state 2 (TN)	state 3 (NC)	state 4 (LA)	state 5 (AL)	state 5 (KY)	state 7 (SC)	state 8 (MS)	state 9 (FL)
27-Jun	1	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)
4-Jul	2									
11-Jul	3									
18-Jul	4	Direct (Tue)								
25-Jul	5		Direct (Tue)							
1-Aug	6			Direct (Mon)						
8-Aug	7	Rebuttal (Tue)								
15-Aug	8		Rebuttal (Tue)		Direct (Tue)		Direct (Tue)			
22-Aug	9							Direct (Tue)	Direct (Tue)	Direct (Tue)
29-Aug	10	Hearing (M-Th)		Rebuttal (Mon)	Rebuttal (Thurs)	Rebuttal (Thurs)				
5-Sep	11									
12-Sep	12		Hearing (M-Th)							
19-Sep	13			Hearing (M-Th)						
26-Sep	14				Hearing (M-W)			Rebuttal (Thurs)	Rebuttal (Thurs)	Rebuttal (Thurs)
3-Oct	15					Hearing (M-W)				
10-Oct	16						Hearing (M-W)			
17-Oct	17	Briefs (Fri)								
24-Oct	18		Briefs (Fri)	Briefs (Fri)	Briefs (Fri)	Briefs (Fri)				
31-Oct	19						Briefs (Fri)			
7-Nov	20									
14-Nov	21									
21-Nov	22							Briefs (Fri)		
28-Nov	23								Briefs (Wed)	Briefs (Fri)
5-Dec	24									
12-Dec	25									
19-Dec	26									
26-Dec	27									
2-Jan	28									
9-Jan	29									
16-Jan	30									
23-Jan	31									
30-Jan	32									
6-Feb	33									
13-Feb	34									
20-Feb	35									
27-Feb	36									
Decision date	30-Jan									
Notes										
1. Yellow shading indicates Holiday week										
2. We are aware that the NCUC requires the filing of a proposed order and estimated cross-examination times (the latter is due 9/14).										

STATE OF SOUTH CAROLINA                    )  
  )  
COUNTY OF RICHLAND                        )

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the Joint Motion of CompSouth and BellSouth to Adopt Schedule in Docket No. 2004-316-C to be served upon the following this June 8, 2005.

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PC Docs # 554784